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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

MARK WILSON

Case No. 6:21-cv-01606-SI

Plaintiffs,

v.

JERRY PLANTE, RONNIE FOSS, CRAIG
PRINS, JOSH HIGHERGER, and
JOHN DOES 1-10.

DECLARATION OF COUNSEL

(UNOPPOSED)

Defendants.

I, Juan C. Chavez, submit the following declaration:

I am the counsel of record for the Plaintiff, Mark Wilson, and I make this declaration in support of Plaintiff's Motion for Extension of Case Deadlines. My statements are true to the best of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true.

1. Through me, Plaintiff has already served a request for production and received some but not all of the documents sought after in his request for production. Additional documents may be produced following entry of a stipulated protective order; however, the parties disagree on some of the terms of that

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protective order. Additionally, further discovery issues may exist and the parties anticipate further argument on those issues. The parties' attorneys have been in consistent contact and we are hopeful that this proposed schedule will allow for this case to be litigated expeditiously.

2. I have conferred with the Counsels for Defendants, Kenneth Crowley and Shannon Vincent, regarding this motion, and she does not oppose the relief requested by this motion.

I hereby declare that above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: March 11, 2022

/s/ Juan C. Chavez
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